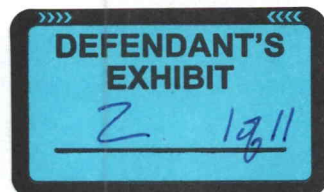


INVOICE

Invoice No. 240738 Matter: Randy L L Corporation Date: July 2024

Date of Service	Task	Total Hours
6/28/24	Draft letter to opposing counsel ("OC"), .2; email to OC regarding the same, .1	.3
7/2/24	Review documents from client, 1.5; draft answer, 1.9	3.4
7/5/24	Draft letter to OC, .3; email to OC regarding the same, .1	.4
7/6/24	Continue drafting answer, 2.4; teleconference with client regarding the same, .1; email to client regarding the same, .1	2.6
7/7/24	Draft response to motion for default judgment and draft motion to set aside default order, 3.8	3.8
7/8/24	Draft declaration in support of response and motion to set aside, .6; draft corporate disclosure statement, .3; revise response to motion for default judgment and motion to set aside default order, 1.8; file answer, corporate disclosure statement, response and motion with court, .3; teleconference with court regarding the same, .2; letter to OC regarding the same, .3; email to OC regarding the same, .1; email to client regarding the same, .1	3.7
7/9/24	Letters from Washington County Sheriff regarding service on 503woodworks and Jimenez, .2; email to client regarding the same, .1	.3
7/23/24	Email from OC regarding original demand, .2; email to client regarding the same, .1; teleconference with client regarding the same, .2; draft request for production ("RFP"), 1.7	2.2
7/24/24	Continue drafting RFP, 1.8; draft interrogatories, 1.9; emails to and from client regarding the same, .2; draft letter and email to OC regarding RFP, .2	4.1
Total Hours		20.8
Hourly Rate		\$500.00
Sub-Total		\$10,400.00
<u>Costs</u>		
	Postage	\$5.38
Total Costs		\$5.38
Sub-Total		\$10,405.38
Previous Invoice		\$0.00
Previous Payments (Thank you!)		\$0.00
Outstanding Balance		\$0.00



Sub-Total	\$10,405.38
Retainer	\$10,000.00
Total Due	\$405.38

Please Replenish Retainer

INVOICE

Invoice No. 240846 Matter: Randy L L Corporation Date: Aug. 2024

<u>Date of Service</u>	<u>Task</u>	<u>Total Hours</u>
8/7/24	Review file, .4; emails to and from court regarding motion to set aside default, .4; emails to and from client regarding interrogatories, .2; review and revise interrogatories and service on Plaintiff's counsel, .9; research regarding other cases involving Plaintiff's counsel, .5; teleconference with Tim Crawley regarding lawsuit against Molligan and Slevin, .3; draft request for admissions, 1.9; draft second set of requests for production, .7	5.3
8/8/24	Email from court regarding plaintiff's filing of no objections to motion to set aside default order and review filing, .2; email to OC regarding lack of certificate of service and service by email on date of filing, .2; emails to and from client regarding requests for admissions and deposition, .2; revise requests for admissions, .5; email to OC regarding requests for admission and deposition, .4	1.5
8/9/24	Email from court regarding denial of plaintiff's motion for default judgment and granting of defendant's motion to set aside default order, .1; emails to and from client regarding the same, .3; research regarding certified access specialist, .6; teleconference with expert regarding inspection and report, .3	1.3
8/13/24	Emails to and from Kyle Iboshi of KGW news regarding his stories on ADA cases, .6; draft notice of intent to serve subpoenas, 1.5; draft third request for production of documents, .4; email to client regarding the same, .1; emails to and from OC regarding deposition, notice of intent to serve subpoenas and third RFP, .2	2.8
8/19/24	Emails to and from OC regarding case, .4; email to client regarding the same, .1	.5
8/20/24	Teleconference with ADA expert, .4; emails to and from ADA expert regarding inspection and report, .2; emails to and from client regarding the same, .3	.9
8/22/24	Emails to and from OC regarding RFP extension, .2; email from court regarding Rule 16 conference, .1; emails to and from OC regarding the same, .1; send subpoenas, .3	.7
8/26/24	Email from OC regarding response to RFP and review response to RFP, .5; email to client regarding the same, .1	.6
8/27/24	Emails to and from client regarding the same, .3; email to OC regarding the same, .9; email to OC regarding depositions, .1; email to client regarding the same, .1; draft motion to compel, 3.2; teleconference with client regarding case, .4; emails to and from the court regarding rule 16 conference, .3	5.3
8/28/24	Teleconference with process server regarding subpoenas and resend subpoenas to process server, .3; email to OC regarding subpoenas, .1; emails to and from client regarding settlement offer, .2; email to OC regarding settlement offer, .3	.9
8/29/24	Emails from court regarding Rule 16 conference, .2	.2
8/30/24	Emails to and from OC regarding stipulated scheduling order, .5; emails to and	

from client regarding the same, .2 .7

Total Hours			20.7
Hourly Rate			\$500.00
Sub-Total			\$10,350.00
<u>Costs</u>			
	Postage	\$3.04	
	Subpoena Fees	\$80.00	
Total Costs			\$83.04
Sub-Total			\$10,433.04
Previous Invoice		\$10,405.38	
Previous Payments (Thank you!)		\$10,000.00	
Outstanding Balance		\$ 405.38	
Sub-Total			\$10,838.42
Total Due			\$10,838.42

Please Replenish Retainer

INVOICE

Invoice No. 240933 Matter: Randy L L Corporation Date: Sept. 2024

Date of Service	Task	Total Hours
9/3/24	Emails to and from client regarding status of case, .2	.2
9/4/24	Emails to and from OC regarding withdrawal and motion to compel, .5; teleconference with OC to confer on motion to withdraw and motion to compel, .1; draft and file motion to compel and supporting documents, 3.7; review plaintiff's motion to withdraw and draft and file response to motion to withdraw, 2.5; teleconference with client regarding the same, .2	7.0
9/6/24	Review amended motion to withdraw, .2; emails to and from OC regarding the same, .3; teleconference with client regarding case, .3; email to OC regarding settlement offer, .4; email to client regarding the same, .1; Rule 16 teleconference with court, .4; email to client regarding the same, .2	1.9
9/9/24	Emails to and from process server regarding subpoenas, .1; emails to and from Kyle Iboshi regarding news story on case and plaintiff's counsel's efforts to withdraw, .1; emails to and from expert regarding site inspection, .1; emails from court regarding prior rule 16 conference, etc., .2	.5
9/10/24	Email from OC regarding declaration of her contact with plaintiff, .2	.2
9/11/24	Email from plaintiff regarding review of plaintiff's counsel declaration, .1	.1
9/12/24	Email to OC regarding Plaintiff's failure to respond to Defendant's second and third RFP, RFA and interrogatories and motion to compel that will be filed if documents and responses are not received by the 13 th , .4; email to process server regarding subpoenas on Tennessee lawyers, .1	.5
9/13/24	Emails to and from OC regarding discovery and untimely responses to RFA, .4; emails to and from client regarding the same, .2	.6
9/16/24	Email from OC regarding deposition of plaintiff, .1	.1
9/17/24	Draft motion for summary judgment, concise statement of facts, supporting declaration and supporting memorandum, 4.3	4.3
9/18/24	continue drafting motion for summary judgment, concise statement of facts, supporting declaration and supporting memorandum, .9; email to client regarding the same, .1; email from OC regarding requests for admission, .1; draft motion for extension of time for reply, .3; file motion for summary judgment and supporting documents and motion for extension of time, .6	2.0
Total Hours		17.4
Hourly Rate		\$500.00
Sub-Total		\$8,700.00

Costs

Postage \$3.43

Total Costs \$3.43

Sub-Total \$8,703.43

Previous Invoice \$10,838.42

Previous Payments (Thank you!) \$15,000.00

Credit \$ 4,161.58

Sub-Total \$4,451.85

Total Due \$4,541.85

Please Replenish Retainer

INVOICE

Invoice No. 241039 Matter: Randy L L Corporation Date: Oct. 2024

<u>Date of Service</u>	<u>Task</u>	<u>Total Hours</u>
10/18/24	Emails to and from court and OC regarding Rule 16 conference, .3	.3
10/21/24	Call to Tennessee firm regarding subpoena, .1	.1
10/24/24	Email to client regarding conference, .1; teleconference with client, .2; emails to and from court regarding rule 16 conference, .3; conference with court, .3	.9
10/29/24	Email to client regarding update, .2	.2
10/30/24	Hearing with court regarding plaintiff's counsel's motion to withdraw and Rule 16 conference, .7; email to client regarding the same, .5; email to OC regarding discovery, .6	1.8
Total Hours		3.3
Hourly Rate		\$500.00
Sub-Total		\$1,650.00
<u>Costs</u>		
	Process Service - Subpoena	\$312.49
	Process Service – Subpoena	\$102.49
Total Costs		\$414.98
Sub-Total		\$2,064.98
Previous Invoice		\$8,703.43
Previous Payments (Thank you!)		\$4,161.58
Outstanding Balance from Previous Invoice		\$4,541.85
Late Fee		\$ 50.00
Sub-Total		\$6,656.83
Total Due		\$6,656.83

Please Replenish Retainer

INVOICE

Invoice No. 241131 Matter: Randy L L Corporation Date: Nov. 2024

<u>Date of Service</u>	<u>Task</u>	<u>Total Hours</u>
11/1/24	Emails to and from client regarding proposed course of action, .2; email to OC regarding discovery, .2	.4
11/4/24	Teleconference with client regarding course of action, .1; emails to and from client regarding the same, .3; email to OC regarding discovery, .2	.6
11/7/24	Emails to and from OC regarding discovery, .4	.4
11/12/24	Review and revise motion to compel response to subpoena, memo and supporting declaration and file the same, 1.3; call to OC regarding conferral prior to filing motion to compel 2 nd , 3 rd RFPs and first set of interrogatories, .1; email to OC regarding the same, .1; draft motion to compel 2 nd , 3 rd RFPs and first set of interrogatories, supporting declaration and memorandum, 3.3	4.8
11/18/24	Draft reply to motion for summary judgment, 3.8	3.8
11/19/24	Continue drafting reply to motion for summary judgment, 3.2	3.2
11/20/24	Emails to and from court regarding hearing transcript, .3; email to client regarding reply to MSJ, .1	.4
11/21/24	Draft reply, emails to and from court reporter regarding conference transcript, .2; obtain and review conference transcript, .5; review and revise reply memo and file the same with the court, 1.9; email to client regarding the same, .1; email to OC regarding the same, .1	2.8
11/25/24	Email from OC regarding lack of responses from Plaintiff, .4; email to client regarding the same, .1; teleconference with OC regarding extension request for WCWS, .1	.6
11/26/24	Emails to and from OC regarding special appearance and motion for extension and review the same, 1.0; review FRCP and local rules regarding the same, .5; teleconference with court clerk regarding linking to WCWS' impermissibly combined appearance and motion, .1; draft and file response, 2.4; email to client regarding the same, .1	4.1
Total Hours		21.1
Hourly Rate		\$500.00
Sub-Total		\$10,500.00
<u>Costs</u>		
	Postage	\$3.15
	Conference Transcript	\$22.10

Total Costs		\$25.25
Sub-Total		\$10,525.25
Previous Invoice	\$ 6,656.83	
Previous Payments (Thank you!)	\$10,000.00	
Outstanding Balance from Previous Invoice	\$ 0.00	
Credit	\$ 3,343.17	
Sub-Total		\$10,525.25
Retainer		\$ 3,343.17
Total Due		\$ 7,182.08

Please Replenish Retainer

INVOICE

Invoice No. 241226 Matter: Randy L L Corporation Date: Dec. 2024

Date of Service	Task	Total Hours
12/2/24	Email from OC regarding untimely responses to second and third RFPs and review responses to second and third RFPs, .8; email to client regarding the same, .1	.9
12/3/24	Email from OC regarding settlement counteroffer, .1; email to client regarding the same, .1	.2
12/5/24	Email from OC regarding responses to interrogatories and review interrogatories, 1.3; email to client regarding the same, .1; teleconference with client, .1	1.5
12/6/24	Teleconference with client regarding states of case and settlement offer, .3; teleconference with court regarding plaintiff's counsel special appearance and motion for extension, .3	.6
12/9/24	Teleconference with Tim Crawley regarding class action of case, 1.0	1.0
12/10/24	Telephone call to client, .1; email to client, .1	.2
12/11/24	Teleconference with client regarding case, .3; email to OC regarding settlement offer, .1	.4
12/13/24	Email from OC regarding mediation, .1; emails to and from client regarding the same, .2	.3
12/16/24	Emails to and from OC regarding mediation, .1; teleconference with client regarding the same, .1	.6
12/17/24	Emails to and from OC regarding mediation, .5	.5
12/18/24	Email from OC regarding motion to compel mediation and motion to extend discovery deadlines and review motions, .3; draft response to motion to compel mediation, 2.7; draft response to motion for extension of discovery deadlines, 1.2	4.2
12/19/24	Review and revise response to motion to compel mediation, .7; continue drafting response to motion for extension of discovery deadlines, 1.0; emails to and from client regarding the same, .1; emails from court granting Defendant's motion for summary judgment and entering judgment against Plaintiff, .3; teleconference with client regarding the same, .2	2.3
12/30/24	Email to OC regarding judgment of court and demand for payment of Defendant's attorney fees and costs, .5; draft motion for attorney fees and costs, including legal research, declaration of Ted Roe and declaration of Wael Rafeh, 4.6	5.1
12/31/24	Draft motion for sanctions, including legal research, 3.8	3.8
Total Hours		21.6
Hourly Rate		\$500.00

Sub-Total		\$10,800.00
<u>Costs</u>	\$0.00	
Total Costs		\$0.00
Sub-Total		\$10,800.00
Previous Invoice	\$10,525.25	
Previous Payments (Thank you!)	\$ 3,343.17	
Outstanding Balance from Previous Invoice	\$ 7,182.08	
Sub-Total		\$17,982.08
Total Due		\$17,982.08

Please Replenish Retainer